

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
CORTLANDT DEPISTERFIELD CARTER III)	Case No. 16-32955-KRH
PAULINA YVETTE CARTER)	Chapter 13
)	
Debtors)	

MOTION TO INCUR DEBT

COME NOW, the Debtors, by counsel, and as and for their Motion to Incur Debt, state as follows:

1. The Debtors filed this case under Chapter 13 of the U.S. Bankruptcy Code on June 13, 2016.
2. The Debtors have applied for and Hart Nissan has approved a loan to the Debtors in the amount of \$28,698.82 plus interest at 17.99% per annum to be repaid with 72 equal monthly payments of \$660.00 for the purchase of a 2021 Nissan Altima or similar vehicle.
3. The Debtors need to purchase the referenced vehicle because one of their vehicles is having mechanical issues, and they need the vehicle to travel to and from work and for personal travel.
4. Upon approval of this Motion, the Debtors will be surrendering the current vehicle back to the lender.
5. The purchase of the vehicle is in the best interest of the Debtors and will facilitate their ability to perform under their Chapter 13 Plan filed herein.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

6. The Debtors' Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtors request that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

CORTLANDT DEPISTERFIELD CARTER III
PAULINA YVETTE CARTER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
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CORTLANDT DEPISTERFIELD CARTER III)	Case No. 16-32955-KRH
PAULINA YVETTE CARTER)	Chapter 13
)	
Debtors)	

NOTICE OF MOTION

The above Debtors have filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: February 5, 2021

CORTLANDT DEPISTERFIELD CARTER III
PAULINA YVETTE CARTER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
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/s/ James E. Kane
James E. Kane

Label Matrix for local noticing

0422-3

Case 16-32955-KRH

Eastern District of Virginia

Richmond

Fri Feb 5 11:51:38 EST 2021

Amca

2269 S Saw Mill

Elmsford, NY 10523-3832

Central Virginia Health Serv.

P.O. Box 220

New Canton, VA 23123-0220

Commonwealth of Virginia

Department of Taxation

PO Box 2156

Richmond, VA 23218-2156

Cynthia B Agone

1717 Walthall Creek Dr.

Colonial Heights, VA 23834-5869

Dr. Audie C Florida

321 Poplar Dr.

Petersburg, VA 23805-9391

Dr. Neema Amin

131 Jennick Dr, Colonial Heig

Colonial Heights, VA 23834-4905

Fort Lee Federal Credi

4495 Crossings Blv

Prince George, VA 23875-1455

(p)INTERNAL REVENUE SERVICE

CENTRALIZED INSOLVENCY OPERATIONS

PO BOX 7346

PHILADELPHIA PA 19101-7346

John W. Summerville

1401 Johnston Willis Dr

Richmond, VA 23235-4730

Americredit Financial Services, Inc. d/ba GM

P O Box 183853

Arlington, TX 76096-3853

Ashley Funding Services, LLC its successors

assigns as assignee of Laboratory

Corporation of America Holdings

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

City of Petersburg

City Treasurer

P.O. Box 1271

Petersburg, VA 23804-1271

Convergent Outsourcing

800 Sw 39th St

Renton, WA 98057-4927

Dept Of Ed/navient

Po Box 9635

Wilkes Barre, PA 18773-9635

Dr. Joel Haling

200 Medical Park Blvd

Petersburg, VA 23805-9274

First National Collection Bure

610 Waltham Way

Sparks, NV 89437-6695

Gm Financial

Po Box 181145

Arlington, TX 76096-1145

Internal Revenue Service

PO Box 7346

Philadelphia, PA 19101-7346

LCA Collections

P.O. 2240

Burlington, NC 27216-2240

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

(p)CAPITAL ONE

PO BOX 30285

SALT LAKE CITY UT 84130-0285

City of Petersburg

Treasurer's Office

P.O. Box 1271

Petersburg, VA 23804-1271

Credit One Bank Na

Po Box 98872

Las Vegas, NV 89193-8872

Dr Luiza Kreuzer

456 Charles H Dimmock Pkwy # 5

Colonial Heights, VA 23834-2936

Dr. Marco Beltrami

456 Charles H. Dimmock Pkwy

Suite 5

Colonial Heights, VA 23834-2936

First Premier Bank

3820 N Louise Ave

Sioux Falls, SD 57107-0145

Hunter Warfield

4620 Woodland Corp

Tampa, FL 33614-2415

Jeffrey K Thompson

2602 Buford Rd.

Richmond, VA 23235-3422

LVNV Funding, LLC its successors and assigns

assignee of FNEM, LLC

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Lab Corp.
PO Box 2240
Burlington, NC 27216-2240

Mabt/cstfin
Document Page 6 of 7
121 Continental Dr Ste 1
Newark, DE 19713-4326

Med Data Sys
645 Walnut St Ste 5
Gadsden, AL 35901-4173

Medical Data Systems I
645 Walnut St Ste 5
Gadsden, AL 35901-4173

Michele Brenner- Vincent
2602 Buford Rd
Richmond, VA 23235-3422

Midland Funding
2365 Northside Dr Ste 30
San Diego, CA 92108-2709

NPRT0 South-East, LLC
256 Data Drive
Draper, UT 84020-2315

Navient Solutions, Inc. on behalf of
Department of Education Loan Services
P.O. Box 9635
Wilkes-Barre, PA 18773-9635

Navy Federal Credit Union
PO Box 3000
Merrifield, VA 22119-3000

Patrick A Oliver
8260 Atlee Rd
Mechanicsville, VA 23116-1844

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Premier Bankcard, Llc
c o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999

Progressive Leasing
P O box 413110
Salt Lake City, UT 84141-3110

Receivable Management
7206 Hull Street Rd Ste
North Chesterfield, VA 23235-5826

Regional Acceptance Co
1420 East Fire Tower Rd
Greenville, NC 27858-4139

Regional Acceptance Corporation
PO Box 1847
Wilson, NC 27894-1847

Rent A Center
3330 S Crater Rd
Petersburg, VA 23805-9277

(p)WAKEFIELD & ASSOCIATES
PO BOX 50250
KNOXVILLE TN 37950-0250

Rotary Club
217 East City Point Rd
Hopewell, VA 23860-7804

Sam English II DDS
798 South Park Blvd Suite 26
Colonial Heights, VA 23834-3614

Santander Consumer USA
PO Box 961245
Fort Worth, TX 76161-0244

Southside Family Practice
24 South Adams St.
Petersburg, VA 23803-4525

Southside Regional Medical Center
c/o PASI
PO Box 188
Brentwood, TN 37024-0188

Southwest Credit Systems
4120 International Parkway
Suite 1100
Carrollton, TX 75007-1958

(p)SPRINT NEXTEL CORRESPONDENCE
ATTN BANKRUPTCY DEPT
PO BOX 7949
OVERLAND PARK KS 66207-0949

Taxing Authority Consulting Sv
PO Box 31800
Henrico, VA 23294-1800

The Nguyen Law Firm
100 Arbor Oak Dr, suite 206
Ashland, VA 23005-2261

US Attorney
Suntrust Building
919 East Main Street, Suite 1900
Richmond, VA 23219-4622

USA Discounters, Ltd.
PO Box 41007
Norfolk, VA 23541-1007

USA Living
P O Box 41007
Norfolk, VA 23541-1007

Virginia Department of Taxatio
P O Box 2369
Richmond, VA 23218-2369

Virginia Eye Institute
400 Westhampton Station
Richmond, VA 23226-3332

Virginia Eye Institute
c/o The Nguyen Law Firm, PLC
100 Arbor Oak Drive, Suite 206
Ashland, VA 23005-2261

Vital Recovery Services LLC
P O Box 923748
Norcross, GA 30010-3748

Cortlandt Depisterfield Carter III
PO Box 3643
Petersburg, VA 23805-3643

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

Paulina Yvette Carter
PO Box 3643
Petersburg, VA 23805-3643

Suzanne E. Wade
341 Dial 877-996-8484 Code 2385911
7202 Glen Forest Drive, Ste. 202
Richmond, VA 23226-3770

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .

Capital One Bank Usa N
Po Box 85015
Richmond, VA 23285-0000

Internal Revenue Service
Kansas City, MO 64999-0002

Portfolio Recovery
PO Box 12914
Norfolk, VA 23541-0000

Revenue Recovery Corporation
P O Box 50250
Knoxville, TN 37950-0000

Sprint
Attn Bankruptcy Dept
PO Box 7949
Overland Park KS 66207-0949

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Americredit Financial Services, Inc. dba G

(d)AmeriCredit Financial Services, Inc. dba G
P O Box 183853
Arlington, TX 76096-3853

(d)AmeriCredit Financial Services, Inc., dba
P O Box 183853
Arlington, TX 76096-3853

(d)Santander Consumer USA, Inc.
P.O. Box 961245
Fort Worth, TX 76161-0244

End of Label Matrix
Mailable recipients 67
Bypassed recipients 4
Total 71